

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CLEARDOC, INC. D/B/A OPENREEL)	
)	
)	C.A. No.: 21-1422-RGA
Plaintiff,)	
)	
v.)	JURY TRIAL DEMANDED
)	
RIVERSIDEFM, INC.)	
)	
Defendant.)	
)	

**CLEARDOC, INC. D/B/A OPENREEL’S RESPONSE TO RIVERSIDE’S NOTICE OF
SUBSEQUENT DEVELOPMENTS [D.I. 59]**

Plaintiff OpenReel submits this response to RiversideFM’s January 19, 2022, “notice of subsequent developments” (D.I. 59). As Riverside did in its opposition to OpenReel’s preliminary injunction motion, Riverside prefers to rely on general references to the word “recording” rather than actually discuss how that term is used in the claim. *See, e.g.*, D.I. 31, at 6-8. None of the materials submitted by Riverside contradict OpenReel’s arguments (*see* D.I. 5, at 6-7; D.I. 47, at 1-3), and submitting more marketing literature does not excuse Riverside’s avoidance of the claim language at issue. OpenReel looks forward to addressing how Riverside satisfies the requirements of the asserted claim at the upcoming hearing.

DATED: January 24, 2022

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